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**PACIFIC  TELESIS**  
Group-Washington

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June 21, 1993

**JUN 21 1993**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Ms. Searcy:

Re: CC Docket No. 90-314

92-100/

On behalf of **Pacific Telesis Group** please find enclosed an original and six copies of its "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

JUN 21 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of the Commission's )  
Rules to Establish New Personal )  
Communications Services )  
 )

GEN Docket No. 90-314  
ET Docket No. 92-100

To: The Commission

COMMENTS OF PACIFIC TELESIS GROUP

Pursuant to the Public Notice<sup>1</sup> dated May 18, 1993,  
Pacific Telesis Group hereby comments on the Spectrum Etiquette  
Proposal from the Wireless Information Network Forum  
("WINForum") and the report from the Unlicensed PCS Ad Hoc  
Committee for 2 GHz Microwave Transition and Management  
("UTAM").

I. INTRODUCTION

Pacific Telesis Group believes that unlicensed  
applications will play a critical role in the development of  
new wireless technologies. Initial offerings of these new  
technologies in the marketplace will likely be in the  
unlicensed area.

To avoid customer confusion and frustration, it is  
highly desirable that handsets that support the new wireless

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<sup>1</sup> Comments Invited on Industry Proposal for Unlicensed  
PCS 2 GHz Transition, GEN. Docket No. 90-314, Public Notice,  
May 18, 1993.

technologies be compatible with licensed and unlicensed applications. Otherwise, customers would be forced to purchase two handsets.

Customers will also expect the same quality of service and transmission and the same features with unlicensed wireless technologies that they have with the wireline technologies. Consequently, Pacific Telesis Group has a strong interest in the development of an efficient spectrum etiquette for unlicensed uses that will promote ease of use and enhance customer satisfaction.

## II. WINFORUM'S PROPOSAL

WINForum's proposal for spectrum etiquette raises some concerns that must be addressed before any final etiquette is adopted. Some of these concerns are a result of the incomplete nature of WINForum's proposal which it describes as a "work in progress."<sup>2</sup>

WINForum proposes to partition a 20 MHz band with 10 MHz allocated to each an asynchronous and isochronous application. Pacific Telesis Group believes that 20 MHz is not sufficient for unlicensed operation. We have supported 40 MHz for unlicensed uses. Moreover, partitioning the band is inefficient. If one type of usage i.e., asynchronous or isochronous, is greater than the other, the secondary use could be under-utilized or lie fallow. There is no need to partition

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<sup>2</sup> WinForum's proposal, p. 3.

the spectrum. A more flexible approach would be more  
efficient. However, if the spectrum is to be partitioned.

channelization scheme (with a reasonable maximum limit) would provide much greater flexibility in usage of various technologies.

WINForum's etiquette is based on "listen-before-talk." While the overall strategy is sound, the method, as described by WINForum, is inefficient because it emphasizes usage of the frequency domain and does not take full advantage of the time domain. WINForum's etiquette allows a user to seize an idle isochronous channel and hold it, preventing others from accessing the spectrum even though portions of the time window might be unoccupied. For example, without taking advantage of the time domain, if only 2 ms in a 10 ms time window is in actual operation, the remaining 8 ms would lie idle. On the other hand, if the time domain could be used in a more efficient manner, it would allow other operators access to portions of the idle 8 ms.

Finally, as noted above, WINForum's proposal is a "work in progress." WINForum acknowledges that constructive criticism will improve its content and phrasing. Pacific Telesis Group believes that public debate is essential in developing the final etiquette and urges the Commission to allow time for this proposal to be considered in standards organizations such as T1 and TR that have procedures that promote consensus through public debate.

### III. UTAM'S PROPOSAL

UTAM's Proposal involves a plan to relocate and compensate microwave users as well as coordinate early deployment of unlicensed PCS prior to complete clearing of the band.

The proposal offers a possible solution to a challenging problem. It would create an "Entity" to manage relocation, compensation and spectrum management functions. Membership would be required for those manufactures who wish to market devices for use in the band. Any party with a material interest in the relocation of microwave incumbents would be allowed to participate.

Pacific Telesis Group is pleased that the structure of the entity includes a dispute resolution forum with neutral mediation for disputes involving interference and/or compensation disputes between unlicensed PCS providers and incumbent microwave licensees. However, we are concerned that disputes may arise concerning the order in which spectrum in various parts of the country is cleared thereby delaying use of unlicensed PCS in some regions. Pacific Telesis Group recommends that dispute resolution address situations of this type.

#### IV. CONCLUSION

Pacific Telesis Group is pleased that the Commission is moving forward on issues involving unlicensed wireless technologies. For the reasons discussed above, Pacific Telesis Group recommends that WINForum's proposal on spectrum etiquette be viewed as a starting place for discussion and that extensive public debate take place prior finalizing the etiquette.

Respectfully submitted,

PACIFIC TELESIS GROUP

  
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